

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF MISSISSIPPI
OXFORD DIVISION**

HAROLD HARRIS; PASTOR ROBERT
TIPTON, JR.; DELTA SIGMA THETA
SORORITY, INC.; DESOTO COUNTY MS
NAACP UNIT 5574,

Plaintiffs,

v.

3:24-cv-00289-GHD-RP

DESOTO COUNTY, MISSISSIPPI;
DESOTO COUNTY BOARD OF
SUPERVISORS; DESOTO COUNTY
ELECTION COMMISSION; and DALE
THOMPSON in her official capacity as
DeSoto County Circuit Clerk,

Defendants.

PLAINTIFFS' MOTION TO EXPEDITE TRIAL DATE

Plaintiffs Harold Harris; Pastor Robert Tipton, Jr.; Delta Sigma Theta Sorority, Inc.; and DeSoto County MS NAACP Unit 5574 respectfully request that the Court alter the trial date in the above-captioned matter to allow for earlier relief from the irreparable harm of dilutive voting districts. Plaintiffs' counsel have conferred with Defendants, who have indicated they intend to oppose this motion.

Plaintiffs challenge DeSoto County's 2022 redistricting plan (the "2022 Plan") as violating Section 2 of the Voting Rights Act, 52 U.S.C. § 10301, by diluting the voting power of DeSoto County's Black residents and depriving them of an equal opportunity to elect their preferred candidates. The 2022 Plan governs five separate County offices (the Board of Supervisors, the Board of Education, the Election Commission, the Justice Court, and Constables) and twenty-five County officials with power over many aspects of residents' lives.

Because of the severe and irreparable nature of these harms, Plaintiffs seek a remedy in place by the November 2026 elections. Based on the information available to them, Plaintiffs believe this goal is readily achievable under the current discovery schedule for the case. However, if the trial is not held until April 2026, as set forth in the current schedule, there is some possibility that the current trial date would not allow for a remedy in place by November 2026. As currently scheduled, the trial start date is April 27, 2026, over seven months after the close of discovery in September and six months after dispositive and *Daubert* motions are due to the Court in October. *See* ECF No. 67, at 4–5. The current trial date may result in relief being unavailable until 2027. By moving earlier only one date—the trial date—Plaintiffs would be able to get relief earlier and at a time that is most efficient for the voting public and for County officials administering elections.

As a result, and for the reasons set forth in the accompanying memorandum of law, Plaintiffs respectfully request the Court grant their motion and move the trial start date as soon as possible after the close of discovery and motion deadlines, and ideally by mid-January 2026.

Dated: March 6, 2025

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Attorneys for Plaintiffs

**Admitted Pro Hac Vice*

CERTIFICATE OF SERVICE

I, Daniel J. Hessel, do certify that on this day I filed the foregoing with the ECF System which sent notification to all counsel of record.

This the 6th day of March, 2025.

/s/ *Daniel J. Hessel*

Daniel J. Hessel